

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
FLOR CARDOZO,

Plaintiff,

NOTICE

-against-

Index No.: 501519/19

JESUS REYES and CARAVAN INC.,

Defendants.
-----X

PLEASE TAKE NOTICE, that pursuant to the provisions of Section 253/254 of the Vehicle and Traffic Law of the State of New York, a copy of the summons and complaint in the above entitled action was served upon you by delivering on April 9, 2019, a copy of the summons and complaint to the Secretary of State of the State of New York, at his office in the City of New York, State of New York, with a fee of \$10.00.

PLEASE TAKE FURTHER NOTICE that we are sending you herewith a copy of the summons and complaint in this action.

Dated: Brooklyn, New York
April 9, 2019



ARTHUR M. UNTERMAN
Attorney for Plaintiff
Office and P.O. Address
26 Court Street - Suite 1806
Brooklyn, NY 11242
(718) 643-4000

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX**

-----X
FLOR CARDOZO

Plaintiff/Petitioner,

- against -

Index No. 20655/2019E

JESUS REYES and CARAVAN INC.

Defendant/Respondent.
-----X

**NOTICE OF ELECTRONIC FILING
(Mandatory Case)
(Uniform Rule § 202.5-bb)**

You have received this Notice because:

- 1) The Plaintiff/Petitioner, whose name is listed above, has filed this case using the New York State Courts E-filing system ("NYSCEF"), and
- 2) You are a Defendant/Respondent (a party) in this case.

• **If you are represented by an attorney:**

Give this Notice to your attorney. (Attorneys: see "Information for Attorneys" pg. 2).

• **If you are not represented by an attorney:**

You will be served with all documents in paper and you must serve and file your documents in paper, unless you choose to participate in e-filing.

If you choose to participate in e-filing, you must have access to a computer and a scanner or other device to convert documents into electronic format, a connection to the Internet, and an e-mail address to receive service of documents.

The benefits of participating in e-filing include:

- serving and filing your documents electronically
- free access to view and print your e-filed documents
- limiting your number of trips to the courthouse
- paying any court fees on-line (credit card needed)

To register for e-filing or for more information about how e-filing works:

- visit: www.nycourts.gov/efile-unrepresented or
- contact the Clerk's Office or Help Center at the court where the case was filed. Court contact information can be found at www.nycourts.gov

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NYSCEF DOC. NO. 2

INDEX NO. 501519/2019

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**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS**

-----X
FLOR CARDOZO,

Plaintiff(s).

-against-

JESUS REYES and CARAVAN INC.,

-----X
Defendant(s).

To the above named Defendant(s):

Index No.:

**Plaintiff Designates
County of Kings
as the place of trial**

**The basis of venue is
Plaintiff's Residence**

**SUPPLEMENTAL
SUMMONS**

**Plaintiff resides at
135 Logan Street
Brooklyn, NY**

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorney within twenty (20) days after the service of this summons, exclusive of the day of service (or within thirty (30) days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

**Dated: Brooklyn, New York
January 25, 2019**



**ARTHUR M. UNTERMAN
Attorney for Plaintiff
Office and P.O. Address
26 Court Street, Suite 1806
Brooklyn, NY 11242
(718) 643-4000**

Defendants Address

**CARAVAN INC.
160 Essex Avenue East
Avenel, NJ 07001**

**JESUS REYES
618 Elm Street
Roselle, NJ 07203**

**JESUS REYES
954 Madison Avenue, 2nd
Elizabeth, NJ 07201**

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NYSCEF DOC. NO. 3

INDEX NO. 501519/2019

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**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS**

-----X
FLOR CARDOZO,

Plaintiff,

-against-

JESUS REYES and CARAVAN INC.,

Defendant.

-----X

**AMENDED
VERIFIED COMPLAINT
Index. No:**

Plaintiff, by her attorney, Arthur M. Unterman, complaining of the defendants
alleges at all times hereinafter mentioned and upon information and belief:

1. Plaintiff is a resident of the County of Kings, City and State of New York.
2. Defendant, CARAVAN INC., is a domestic corporation organized and existing pursuant to the laws of the State of New York.
3. Defendant, CARAVAN INC., is a foreign corporation authorized to do business in the State of New York and doing business in the State of New York.
4. Defendant, CARAVAN INC., is a foreign corporation doing business in the State of New York.
5. Defendant, CARAVAN INC., was the owner of a motor vehicle bearing New Jersey registration number AS507W for the year 2018.
6. Defendant, JESUS REYES, operated, managed, and controlled the aforesaid motor vehicle.
7. Defendant, JESUS REYES, operated the aforesaid motor vehicle with the knowledge, permission, and consent of the owner.
8. The aforesaid motor vehicle was operated with the knowledge, permission and consent

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of the owner.

9. Defendant, JESUS REYES, was an employee of defendant CARAVAN INC.

10. Defendant JESUS REYES operated the aforesaid motor vehicle within the scope of and pursuant to his duties as an employee of defendant CARAVAN INC.

11. Plaintiff operated a motor vehicle.

12. Bushwick Avenue and Boerum Street, at or about their intersection, were and still are public thoroughfares located in the County of Kings, City and State of New York, commonly used for vehicular traffic.

13. That on or about November 7, 2018, at the aforementioned location the aforesaid motor vehicles were in contact.

14. That by reason of said occurrence, plaintiff was injured.

15. That by reason of said occurrence, plaintiff was seriously injured.

16. That plaintiff sustained a serious injury as defined in subsection (d) of section 5102 of the Insurance Law, and/or economic loss greater than basic economic loss, as defined in subsection (a) of section 5102 of the Insurance Law.

17. That the injuries and damages sustained by the plaintiff were caused solely by reason of the negligence, carelessness and recklessness of the defendants without any fault on plaintiff's part contributing thereto.

18. This action falls within one or more of the exceptions contained in CPLR Section 1602.

19. That as a result of the foregoing, the plaintiff has been damaged by the defendants in an amount which exceeds the jurisdictional limits of all lower Courts.

WHEREFORE, plaintiff demands judgment jointly and severally against the defendants,

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in an amount which exceeds the jurisdictional limits of all lower Courts, together with the costs and disbursements of this action.

Dated: Brooklyn, New York
January 25, 2019



ARTHUR M. UNTERMAN
Attorney for Plaintiff
Office and P.O. Address
26 Court Street - Suite 1806
Brooklyn, NY 11242
(718) 643-4000

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INDIVIDUAL VERIFICATION

STATE OF NEW YORK)
) : SS:
COUNTY OF KINGS)

I, the undersigned, being sworn, say: I am the plaintiff in the action; I have read the foregoing *Amended Complaint* and know the contents thereof; the same is true to my own knowledge, except as to the matters therein stated to be alleged on information and belief, and as to those matters I believe it to be true.

The grounds of my belief as to all matters not stated upon my own knowledge are as follows:

ATTORNEY'S FILE AND CONVERSATION WITH OTHERS.

X *[Signature]*
FLOR CARDOSO

Sworn to before me this *25th*
day of *January* *2019*

[Signature]
ARTHUR M. UNTERMAN
Notary Public, State of New York
No. 81-4662612
Qualified in New York County
Commission Expires June 30, 20*19*

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Index No. Year
SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS
FLOR CARDOZO,

Plaintiff(s).

-against-

JESUS REYES and CARAVAN INC.,

Defendant(s).

SUPPLEMENTAL SUMMONS AND AMENDED VERIFIED COMPLAINT

ARTHUR M. UNTERMAN

Attorney for Plaintiff(s)

Office and Post Office Address, Telephone

26 COURT STREET, SUITE 1806

BROOKLYN, NEW YORK 11242

(718) 643-4000

To

Attorney(s) for

Service of a copy of the within

is hereby admitted

Dated,

Attorney(s) for

Please take notice

NOTICE OF ENTRY

that the within is a (certified) true copy of a
duly entered in the office of the clerk of the within named court on

19

NOTICE OF SETTLEMENT

that an order of which the within is a true copy will be presented for
settlement to the HON. one of the judges
of the within named court, at

on 19 at M.

Dated,

Yours, etc.

ARTHUR M. UNTERMAN

Attorney for Plaintiff(s)

Office and Post Office Address

26 COURT STREET, SUITE 1806

BROOKLYN, NEW YORK 11242

To

Attorney(s) for

To find legal information to help you represent yourself visit www.nycourthelp.gov

**Information for Attorneys
(E-filing is Mandatory for Attorneys)**

An attorney representing a party who is served with this notice must either:

1) Immediately record his or her representation within the e-filed matter on the NYSCEF site www.nycourts.gov/efile ; or

2) file the Notice of Opt-Out form with the clerk of the court where this action is pending and serve on all parties. Exemptions from mandatory e-filing are limited to attorneys who certify in good faith that they lack the computer hardware and/or scanner and/or internet connection or that they lack (along with all employees subject to their direction) the knowledge to operate such equipment. [Section 202.5-bb(e)]

For additional information about electronic filing and to create a NYSCEF account, visit the NYSCEF website at www.nycourts.gov/efile or contact the NYSCEF Resource Center (phone: 646-386-3033; e-mail: efile@nycourts.gov).

Dated: JANUARY 25, 2019

ARTHUR M. UNTERMAN
Name

26 COURT STREET, SUITE 1806
Address

ARTHUR M. UNTERMAN
Firm Name

BROOKLYN, NY 11242

718-643-4000
Phone

AMUNYC@AOL.COM
E-Mail

To: JESUS REYES

CARAVAN INC.

6/6/18